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REDACTED

Attorney for Plaintiffs

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

Plaintiffs,  
  
vs.  
  
ACandS, INC., et al.,  
  
Defendants.

COMPROMISE AND RELEASE OF ALL  
CLAIMS, INCLUDING UNKNOWN AND  
FUTURE CLAIMS

1. Release Of All Personal Injury and Death Claims

(a) THIS RELEASE EXTINGUISHES ALL CLAIMS FOR ALL INJURIES  
ARISING FROM OR RELATED TO ANY EXPOSURE TO ASBESTOS EXPERIENCED BY  
INCLUDING, BUT NOT LIMITED TO, THOSE INJURIES NOW KNOWN,  
THOSE NOW EXISTING BUT UNKNOWN, THOSE THAT MANIFEST THEMSELVES IN  
THE FUTURE, AND THOSE THAT CAUSE HIS DEATH. THIS RELEASE SPECIFICALLY  
EXTINGUISHES ALL CLAIMS BASED ON ANY CANCER OR MALIGNANCY.

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19. The Undersigned Acknowledge and Understand the Following Provisions of the California Insurance Code

It is unlawful to: (1) Knowingly present or cause to be presented any false or fraudulent claim for the payment of a loss under a contract of insurance; (2) Knowingly file multiple claims for the same loss or injury with more than one insurer with an intent to defraud the insurer; (3) Knowingly prepare, make, or subscribe any writing, with intent to present or use the same, or to allow it to be presented or used in support of any such claim.

20. Confidentiality

Each party to this Release agrees not to make public or otherwise reveal or disclose to any third party, except as may be required by law or agreed to in writing in advance by each of the parties to this Release, any of the terms of this Compromise and Release.

\_\_\_\_\_  
Releasor. Dated: \_\_\_\_\_

State of \_\_\_\_\_  
County of \_\_\_\_\_

On \_\_\_\_\_ before me, \_\_\_\_\_, personally appeared, \_\_\_\_\_, \_\_\_\_\_ personally known to me - OR - \_\_\_\_\_ proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. WITNESS my hand and official seal.

\_\_\_\_\_  
Notary Public

REDACTED